

October 17, 2017

Mr. Rex Lane  
Michigan Department of Environmental Quality  
Kalamazoo District Office  
7953 Adobe Road  
Kalamazoo, Michigan 49009-5025

Re: Violation Notice Dated September 26, 2017  
Issued to Real Alloy Specification, Inc.  
SRN N5957, Branch County

Dear Mr. Lane:

The Real Alloy Specification, Inc. facility in Coldwater, Michigan ("facility") received a violation notice, dated September 26, 2017, from your office. The violation notice was issued for an incident that occurred on May 17, 2017 where reverberatory furnace #8 (EUALFURN8-S1) exceeded the chlorine pound/ton charge parameter limit recorded in the facility's Operating, Maintenance and Monitoring (OM&M) Plan. Under the OM&M Plan at the time of the exceedance, the furnace limit was 56.0 pounds chlorine/ton charged. On May 17, 2017, heat B0811037 has a chlorine rate of 61.5 pounds chlorine/ton charged. As referenced in the violation notice, the exceedance was reported in the Semi-annual Excess Emissions/Summary Report.

The Company promptly completed a thorough investigation of the incident. The Company determined that the furnace operator had added 700 pounds of flux and documented this addition on a weight ticket, however did not document on the Production Heat Sheet. Since this weight was not entered into the Production Heat Sheet, the furnace operator was unaware of the exceedance. The missing entry was discovered by Data Entry Clerk after the heat had been completed. To prevent reoccurrence, the Production Supervisor will reconcile the weight tickets to the Production Heat Sheet prior to tapping the furnace to ensure there is not a chlorine pound/ton charge exceedance.

An analysis of hydrochloric acid emissions during the chlorine exceedance event was performed to determine if an emissions exceedance of the federal and state HCl limit of 0.4 pound/ton occurred as a result of the excessive chlorine addition on March 24th. The BH1 baghouse was operating as designed and lime was being injected at the required rate of 125 pounds per hour. The last performance test on BH1 performed in September 2013 showed HCl emissions of only 7% of the allowable limit with a chlorine injection rate of 56 pounds per ton of charge. Based on our analysis, the HCl emissions from the furnace during the March 24th event remained well below the NESHAP and state operating permit limit of 0.40 pound of HCl per ton emission limit for the entire heat (calculated HCl emission rate of 0.056 lb./ton).

**REAL ALLOY SPECIFICATION, INC.  
368 WEST GARFIELD AVENUE  
COLDWATER, MICHIGAN 49036**

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If you need additional information or have any questions related to this parameter deviation, please contact me at your earliest convenience at (517) 279-4032.

Sincerely,



Doug Bryant  
Plant Manager

cc: Andy Jennings, Real Alloy – Corporate HSE  
Jeff Ferg, Real Alloy – Corporate HSE  
Brady Myers, Real Alloy – Corporate HSE  
Janine Caldwell, Real Alloy – Coldwater  
Lynn Fiedler – MDEQ  
Mary Ann Dolehanty – MDEQ  
Christopher Ethridge – MDEQ  
Thomas Hess – MDEQ  
Mary Douglas – MDEQ

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